

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED NATIONAL SPECIALTY INSURANCE  
COMPANY,

CIV: 07 CV 10934

Plaintiff,

**REPLY TO  
COUNTERCLAIM**

-against-

1854 MONROE AVENUE H.D.F.C. and EULALIA  
BALAGUER,

Defendants.

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X

Plaintiff, UNITED NATIONAL SPECIALTY INSURANCE COMPANY (“United National”), by its attorneys, MIRANDA SOKOLOFF SAMBURSKY SLOWNE VERVENIOTIS LLP, answering the defendant EULALIA BALAGUER’S (“Balaguer”) Counterclaim, alleges, upon information and belief, as follows:

1. Denies the allegations contained in paragraph number “1” of the counterclaim.
2. Denies the allegations contained in paragraph number “2” of the counterclaim.
3. Denies the allegations contained in paragraph number “3” of the counterclaim.
4. Denies the allegations contained in paragraph number “4” of the counterclaim.
5. Denies the allegations contained in paragraph number “5” of the counterclaim.
6. Denies the allegations contained in paragraph number “6” of the counterclaim.
7. Denies the allegations contained in paragraph number “7” of the counterclaim.
8. Denies the allegations contained in paragraph number “8” of the counterclaim.
9. Denies the allegations contained in paragraph number “9” of the counterclaim.
10. Denies the allegations contained in paragraph number “10” of the counterclaim.
11. Denies the allegations contained in paragraph number “11” of the counterclaim.

12. Denies the allegations contained in paragraph number "12" of the counterclaim.
13. Denies the allegations contained in paragraph number "13" of the counterclaim.
14. Denies the allegations contained in paragraph number "14" of the counterclaim.
15. Denies the allegations contained in paragraph number "15" of the counterclaim.
16. Denies the allegations contained in paragraph number "16" of the counterclaim.
17. Denies the allegations contained in paragraph number "17" of the counterclaim.
18. Denies the allegations contained in paragraph number "18" of the counterclaim.

**WHEREFORE**, plaintiff, UNITED NATIONAL SPECIALTY INSURANCE COMPANY, demands judgment dismissing the defendants' Verified Counterclaim herein, together with the costs, disbursements and attorneys' fees for this action, and any other relief that this Court may deem appropriate.

Dated: Mineola, New York  
March 17, 2008

MIRANDA SOKOLOFF SAMBURSKY  
SLOWNE VERVENIOTIS LLP  
Attorneys for Defendant  
**UNITED NATIONAL SPECIALTY  
INSURANCE COMPANY**

By:

  
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TO:

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